

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 1 of the Commission's)	MD Docket No. 10-234
Rules Concerning Practice and Procedure;)	
Amendment of CORES Registration)	
System)	

**COMMENTS OF ARRL, THE NATIONAL ASSOCIATION
FOR AMATEUR RADIO**

ARRL, the national association for Amateur Radio, formally known as the American Radio Relay League, Incorporated (ARRL), by counsel and pursuant to the *Notice of Proposed Rule Making*, FCC 10-192, 76 Fed. Reg. 5652 *et seq.*, released December 7, 2010 (the Notice), hereby respectfully submits its comments in response to the Commission's proposed revisions to rules relating to the Commission's Registration System, known as "CORES." The Notice states that the proposed rules are intended to improve the CORES system, and are based on the Commission's experience with the system and some suggestions from the private sector. In the interests of the 700,000 Amateur Radio licensees of the Commission, most of whom are required to obtain and utilize an FCC Registration Number or "FRN" in order to conduct transactions with the Commission including licensing, license modifications and license renewals, and who therefore utilize the CORES system, ARRL states as follows:

1. The Notice claims that the revised CORES system will make it easier for individuals and entities to do business with the Commission. In addition, the Commission states that this proceeding is related both to the Commission's new Core Financial System and to the development and design of the FCC's anticipated new Consolidated Licensing System ("CLS").

ARRL is most interested in the rollout of the CLS. ARRL was one of the participants in the Commission's April 7, 2010 Workshop on the development of the CLS.¹ It is suggested that a truly consolidated licensing system will include interactivity with the CORES system, and that the rollout of the CLS may and should address many of the issues in this proceeding. CLS may well render part of this proceeding moot, as is discussed below. The timing of the instant proceeding may therefore be reasonably questioned, to the extent that substantial changes to the CORES system in this proceeding may be untimely in view of the impending development of the CLS.

2. Among the proposals in the Notice are the following: (1) requiring entities and individuals to rely primarily upon a single FRN that may be linked to subsidiary or associated accounts; (2) allowing entities to identify multiple points of contact; (3) eliminating some exceptions to the requirement that entities and individuals provide their Taxpayer Identification Number ("TIN")² at the time of registration; (4) requiring FRN holders to provide their e-mail addresses; (5) giving FRN holders the option to create a custom User ID; (6) modifying CORES log-in procedures for entities so as to ease use by multiple individuals; (7) adding attention flags and notices that would inform FRN holders of their financial standing before the Commission when logging onto CORES; and (8) adding data fields to enable FRN holders to indicate their tax-exempt status. Not all of these proposals affect Amateur Radio Service licensees, but some do. Radio Amateurs have a distinct interest in the fact that there is, at present, no mechanism for

¹ *Federal Communications Commission (FCC) To Hold April 7, 2010 Workshop on Development of Consolidated Licensing System*, MD Docket No. 10-73, Public Notice, 25 FCC Rcd. 3176 (2010).

² For individuals, the TIN is their Social Security Number (SSN). Individual radio Amateurs are very sensitive about disclosure of SSNs. The fear of identity theft has made this concern more pronounced in recent years. The Commission should provide assurances to licensees about the confidentiality of their SSNs when submitted in CORES. Some Amateur Radio licensees in ARRL's experience have decided to forego license renewals subsequent to the requirement of filing their SSNs due to concerns about the protection of their private information in CORES. Such an extreme response was of course unnecessary, but it illustrates the level of concern among licensees about SSNs in particular. Licensee entities in other services which provide EINs are typically not similarly sensitive.

data transfer between the Universal Licensing System (“ULS”) in which all Amateur Radio licensing transactions are done, and CORES. As well, Amateur licensees have a distinct interest in the information that they are required to provide to the Commission relative to the CORES system.

3. The ultimate concern of radio Amateurs in this proceeding is that any registration system should be as understandable, straightforward, and uncomplicated as possible, so as to facilitate timely compliance by the individuals who are licensees in the Amateur Radio Service, and who have very limited need for interaction with the CORES system. Unlike most other radio services regulated by the Commission, the licensees doing business with the FCC in the Amateur Radio Service are private individuals, and not businesses or organizations (with the exception of Amateur Radio clubs, which are non-commercial entities). While the licensees in those other radio services may have specialized personnel, consultants or attorneys experienced in and tasked with handling Commission-related transactions such as keeping records up to date, Amateur Radio licensees do not have regular contacts with the Commission’s databases and systems, and therefore cannot reasonably be expected to have expertise and familiarity in dealing with the CORES system or ULS. Amateur Radio licensees as a whole make scrupulous efforts to comply with the Commission’s regulations. To enable them to comply with data updating requirements and to provide the Commission with the information it needs to carry out its regulatory responsibilities, the systems with which licensees interact and the regulations governing those interactions have to be comprehensible and “user friendly” to the diverse and very large population of private individuals who hold Amateur Radio licenses. Further, keeping to a reasonable minimum the information that licensees are required to provide and update will promote compliance and will help to ensure that the information the Commission has on record

is accurate and suitable for carrying out its responsibilities.

4. ARRL is the largest of the Commission's several Volunteer Examiner Coordinators (VECs), which prepare and administer Amateur Radio license examinations through Volunteer Examiners (VEs). VECs submit large amounts of licensing data to the Commission in batch files on behalf of successful examination candidates, regularly. ARRL therefore has a keen interest in ensuring that the burden on VECs, many of which are very small organizations staffed entirely by volunteers, does not become so great that they decide to stop offering their services to the Amateur Radio Service. As well, ARRL has an interest in ensuring that personal data required to be furnished and maintained on file with the Commission with respect to licensees (which comes into the possession of VEs and VECs for transmission to the Commission) be limited to the minimum necessary for the Commission's purposes. As is discussed below, ARRL does not favor the furnishing of facsimile numbers and e-mail addresses in CORES. The private data which must be provided to the Commission should in any case be kept private and not published by the Commission.

5. These concerns stated, this proceeding is somewhat unusual in that the Commission appears to be conducting database development by asking users how to do it, rather than by compiling its own list of requirements; developing the database system based on those requirements itself; and then asking users for feedback based on experience with it. Assuming that the Notice is asking groups of users of the licensing databases and CORES what their own requirements and experiences with the CORES system are, the following points are offered relative to the Amateur Service:

- (a) Required information should be kept to a minimum. The more information that radio Amateurs must provide, the more frequently that information will need to be updated.

(b) The system must be simple and should not present to the user information extraneous to the radio service in which the user is licensed once that licensee logs in and reports the radio service of interest to him or her. The more complicated or cumbersome the navigation through the system is to individuals of normal intelligence and typical database literacy but with limited contacts with the database, the less likely individuals are to successfully and timely comply with updating requirements.

(c) There is very little interaction between Amateur Radio licensees and the Commission's ULS database. There is even less interaction with CORES after initial registration and an FRN is obtained. Initial licensing and upgrades, and many license renewals, are handled by VECs. License renewals are only once every ten years, even if done by the licensee herself or himself. Given those intervals, manual data entry by licensees necessitates simplicity; a single point of data entry; and elimination of duplicative data requirements.

(d) License modifications are done when a licensee upgrades her or his license class, or changes a mailing address, or obtains a vanity call sign. Administrative Updates in the ULS are relatively simply accomplished in those cases. By contrast, individuals rarely need to access CORES. Since VE teams and VECs often assist a licensee at the time of first licensing and license upgrades, a licensee may never have any need to access CORES on her or his own behalf at all. Requiring periodic updates of CORES data manually by licensees, *rather* than a configuration that has the *option* of automatically importing from the licensing databases or portions of a consolidated database system is highly problematic in this environment.

6. ARRL, as the result of its VEC operations has in other, past proceedings and forums noted to the Commission certain specific concerns about the CORES system as it is presently configured. These concerns have not been heretofore resolved, and they should be addressed in this proceeding. Registering Taxpayer Identification Numbers in the CORES System, for example, can be problematic. On the CORES web site it is stated: "If you wish to conduct business with the FCC, you must first register through the FCC's COmmission REgistration System (CORES). Upon registration, you will be assigned a FCC Registration Number (FRN). This number will be used to uniquely identify you in all transactions with the FCC." Currently, however, the CORES registration system permits multiple registrations for the same TIN

(whether it be an SSN or EIN). This can result in the assignment of multiple FRNs to a single individual (or entity) in the CORES database. This causes confusion for individual license applicants in the Amateur Service, and for the VEC in determining which of several FRNs is associated with the license for that individual. The CORES registrant is certainly not 'uniquely' identified by a given FRN if she or he is allowed to register for more than one FRN with the same TIN. This suggests the value of limiting the number of FRNs to be assigned per TIN to one.³ To address the Commission's question at paragraphs 20 and 21 of the Notice, there is no apparent need for Amateur Radio Service licensees to be permitted to retain or deploy either multiple FRNs or sub-FRNs.⁴ Instead, an individual should be limited to one FRN per TIN.

7. To finish or implement the CORES registration process in its current configuration, the applicant must initially associate or attach an FRN to the ULS license. This action implies that CORES data and the ULS license data are interconnected, which they are not. The information in each database is now entirely separate, to the extent that updating CORES information does not update the ULS information, and vice-versa.⁵ Adding to the confusion is the fact that the same log-in password is used for both the CORES and ULS systems. The impending replacement of the ULS with the CLS presents an opportunity for the Commission to bridge the current lack of connection between CORES and the ULS.

³ There are other practical reasons in the context of Amateur Radio Service licensing for limiting individuals to one FRN per TIN. The Commission has recently amended the Amateur Service rules with respect to applications for vanity call signs for club station licenses. It has limited club station trustees to one vanity call sign assignment per FRN so as to limit the "warehousing" of scarce vanity call signs. Limiting the number of FRNs per TIN to one will preclude abuses of this new, equitable process.

⁴ An individual Amateur Radio licensee may also serve as the trustee for an Amateur Radio club station. In that case, the licensee uses her or his FRN in transactions involving the licensee's personal Amateur Radio license while using the Amateur Club's FRN for transactions involving the club station license, so sub-FRNs are not necessary in that context.

⁵ This is not unique to the CORES/ULS relationship. CDBS, for example, and CORES have the same disconnected updating process, which is not well understood by licensees using either ULS or CDBS.

8. There are certain anomalies in the CORES system as it is presently configured which are perhaps unique to Amateur Radio licensees. These are contrary to the Commission's expectations for CORES. Examples of these anomalies (experienced and addressed by the ARRL- VEC) follow. These issues create unnecessary work for the VECs and for the Commission and should be addressed in any modification to the CORES system and/or in the creation of the CLS.

EXAMPLE 1 - ULS Database. An FRN was registered to a husband using his SSN, and associated with his Amateur Radio call sign. The wife was not registered in CORES with her SSN, but she was nevertheless permitted by the ULS to attach her husband's FRN (which contains his name and social security number) to her AR license.

EXAMPLE 2 - CORES Database. One registrant has been permitted to register his social security number three times in the CORES database, creating three FRN records. It is difficult for a VE at a license examination session, or the VEC afterward, to determine which FRN number should be associated with the Amateur Radio license record.

EXAMPLE 3 - CORES Database / ULS Database. A successful examinee's license data was submitted to the Commission by electronic batch file for a new license. A response file error message came back to the VEC from the Commission stating: "Applicant already has one Amateur License". The VEC's investigation revealed that the examinee did not in fact hold a license. His wife, however, did hold a license using the husband's FRN and CORES registration. The couple was instructed to detach the husband's FRN from the wife's license; register the wife in CORES using her own social security number and then attach the new FRN containing her personal information to her license. Once this was completed, the ARRL-VEC was able to successfully resubmit the data for the examinee's new license. This is a cumbersome and time-consuming problem that can be avoided by a CORES/ULS interface or in the development of the CLS.

Given the foregoing examples, it is suggested that the Commission's assumption at paragraph 21 of the Notice that the Commission's "current process for how entities and individuals obtain an FRN from CORES requires that only a single registrant may be associated with each FRN" is not necessarily accurate as a practical matter, at least in the limited contexts noted above.

9. Turning to the issues in the Notice of specific concern to the Amateur Radio Service, the Commission notes at paragraph 28 of the Notice that FRNs are required for all those doing business with the Commission. This includes foreign registrants and non-United States citizens who do not have a TIN or SSN. However, the Commission has regularly permitted individuals to complete the CORES registration process without providing a valid TIN. This is accomplished by certifying that the person has not been issued an SSN because they are not a U.S. citizen. At paragraph 30 of the Notice, the Commission proposes to eliminate this exception for foreign individuals. It notes that foreign nationals working in the United States, including all individuals working in the United States on an immigrant visa, are issued an SSN by the Social Security Administration (SSA), and that some temporary visitors, students, and workers on non-immigrant visas are allowed and sometimes required to obtain an SSN. Foreign nationals can obtain a form of TIN (not now accepted by CORES) known as an “Individual Taxpayer Identification Number,” (ITIN). The IRS issues ITINs to individual non-U.S. citizens who are required to have a U.S. taxpayer identification number but who do not have, and are not eligible to obtain, an SSN from the SSA. The Commission tentatively proposes that such non-U.S. citizen individuals be permitted to use their ITIN in place of an SSN when applying for an FRN if they are not eligible for an SSN.

10. ARRL supports this proposal. There are many non-U.S. citizens who are Commission licensees in the Amateur Radio Service. It is not unreasonable for the Commission to require that these individuals comply with registration requirements equivalent to those applicable to United States citizens, and CORES registration helps preclude potential abuses of the Commission’s licensing system. Providing ITINs or SSNs should not be an overwhelming hurdle for non-U.S.

citizens in exchange for their ability to maintain a United States-issued Amateur Radio license.⁶ United States radio Amateurs, acting as ambassadors of international goodwill, operate Amateur stations with United States licenses outside Commission jurisdiction under reciprocal, bilateral and multilateral treaty agreements permitting operation in numerous countries outside the United States. The same opportunity exists for residents of those countries who are licensees to operate their stations here. If a non-U.S. citizen from one of those countries who holds a United States Amateur Station and Operator license finds the process of obtaining an ITIN burdensome, she or he can operate their station pursuant to such bilateral and/or multilateral agreements, foregoing the necessity to maintain a United States Amateur Radio license. The process might also inhibit those non-U.S. citizens who would obtain a United States Amateur Service license but never use it, or use it only once during their lifetime, which is not an infrequent occurrence.

11. At paragraph 36 of the Notice, the Commission notes that Amateur Radio clubs are not required to provide a valid TIN of one of their members (a club trustee) in order to obtain an FRN through CORES. There now exists a TIN exemption for an “amateur club” which the Commission proposes to retain.⁷ However, it proposes to rename “amateur club” to “amateur radio club” for clarity. ARRL supports the proposed wording clarification. The Commission proposes as well to limit the use of FRNs obtained through the use of the “amateur club” TIN

⁶ Before the Commission implements such a requirement, however, it should ascertain that the Internal Revenue Service is willing to issue ITINs to non-U.S. citizens for the purpose of registering those persons in CORES. A review of the IRS form W-7 reveals that the listed purposes for issuing an ITIN do not specifically include registration with another Federal agency. The IRS form requires the submission of the applicant’s most recent tax return, unless the applicant is subject to one of several listed exceptions. One of those reads “other”. Whether or not the acquisition of an ITIN is a difficult hurdle for a non-U.S. citizen attempting to register in CORES is dependent in part on the availability of ITINs for those non-U.S. citizens who do not have SSNs.

⁷ The rationale for the proposed retention of the TIN exception for Amateur Radio clubs is not clear. It is certainly enough a simple matter to obtain an EIN for an organization, be it incorporated or unincorporated. However, Amateur Radio clubs are for the most part non-profit entities and are to be encouraged. Therefore, the exception, to the extent that it is based on flexibility, is well-taken.

exception to applying for Amateur Service licenses only (as opposed to applications for licenses in another radio service). ARRL supports this limitation as well. Requiring a valid TIN from an amateur radio club when applying for Commission licenses other than Amateur Service licenses could prevent misuse and exploitation of the Commission's licensing system.

12. The Commission asks what documentation should be required from an Amateur Radio club when the club seeks a TIN exemption. With respect to this, the Commission should refer to the service rules (47 C.F.R. Part 97) for the Amateur Radio Service as they pertain to the definition of an Amateur Radio club. Section 97.5(b)(2) of the Commission's rules offers a sufficient definition, and allows a determination to be made as to the *bona fides* of an Amateur Radio club and therefore its entitlement to a TIN exemption. That rule sets forth the requirements for a club station license: A club station license is granted only to the person who is the license trustee designated by an officer of the club. The trustee must be a person who holds an operator/primary station license grant. *The club must be composed of at least four persons and must have a name, a document of organization, management, and a primary purpose devoted to amateur service activities consistent with Part 97 of the Commission's rules.* Given this, what should be required to be submitted in order to justify a club TIN exemption is a *certification*⁸ that the Amateur Radio club possess the definitional elements of an Amateur Radio club, *to-wit*: a document of organization (articles of association, bylaws, charter, etc.); current officers (management), a list of members (at least four persons) and a license trustee designated by an officer of the club. These are reasonable definitional elements; they sufficiently determine that a

⁸ Amateur Radio club station license grants are processed by a "Club Station Call Sign Administrator" (CSCSA) pursuant to Section 97.17(b) (2) of the Commission's Rules. It should not be necessary for the CSCSA to handle any CORES registration or review documentation for purposes of TIN exemptions. Rather, when registering in CORES, the club trustee should be required to certify that the club meets the definitional requirements of Section 97.5(b) (2) of the Commission's rules.

club is *bona fide*; and they can be certified to by a CORES registrant without any submission of documentation to the Commission.

13. At paragraph 40 of the Notice, the Commission proposes to require e-mail addresses when individuals and entities register in CORES. Presently, this is optional for both entities and individual registrants for an FRN. The Commission notes a significant increase in the use of and dependence on e-mail since CORES was first implemented. The Notice asserts that e-mail communication is an efficient tool for maintaining contact with Commission regulatees when, for example, a fee payment issue arises or if there is a need to disseminate an important notice. E-mail addresses, the Notice promises, will remain confidential.

14. ARRL suggests that the furnishing of e-mail addresses is not justified in the context of CORES. It could be justified, perhaps, with respect to licensing databases, but even then, there are practical difficulties with requiring the furnishing of e-mail addresses. The immediacy, convenience and reduced environmental effects of e-mail versus paper correspondence are acknowledged. There is some potential value in cases in which the Commission needs to contact a licensee in near-real-time, such as in interference resolution situations.⁹ The advantages of e-mail over paper mail in the context of fee issues and communications related to CORES, however, are not at all clear. There are, moreover, numerous problems with the Notice proposal. First, the Commission cannot assume that everyone can obtain and provide an email address when registering in CORES.¹⁰ Some individuals who may be Amateur Radio licensees are

⁹ Even in that context, however, it is not apparent that e-mail is as effective as paper mail. There is no certainty that an e-mail message from the Commission is actually received. A licensee's spam filter may reject an important Commission e-mail message, in which case the message, not actually received, becomes a liability to the recipient but not a benefit to the Commission.

¹⁰ In other Commission procedures and processes, the Commission has never before presumed that all of its licensees have available e-mail or the ability to conduct online transactions individually. For example, in license

children, economically disadvantaged individuals, persons in very rural environments, or persons who simply do not have or cannot provide an e-mail address. The Notice does not make reference to exceptions for any such individuals, and they should not be excluded from obtaining a FRN and ultimately a license in the Amateur Radio Service. The Amateur Radio Service is inclusive rather than exclusive. The Commission's processes used in administering the Service should be no different.

15. The 14 VECs which prepare and administer Amateur Radio examinations to candidates for initial and upgraded Amateur Radio licenses use a specific and universal form¹¹ in order to gather information about examination candidates (and potential and existing licensees). The majority of VECs permit the form to be completed in handwriting by the candidate. It is necessary to do this in the context of examination sessions (which are conducted in an open, previously publicized group environment). Deciphering examinees' names and addresses for submission to the Commission electronically in batch files is a difficult enough process; deciphering handwritten email addresses is often even more challenging. Requiring the furnishing of email addresses would be exceptionally time-consuming for VECs and would not necessarily yield good results. Although not required by the Commission, the ARRL VEC does submit new licensee phone numbers when those are provided on the standard VEC form. Phone numbers are easier to read and therefore enter into the FCC data entry system than are e-mail addresses.

auction proceedings, telephone bidding is available as an alternative to electronic bidding. In connection with application fees, the option to pay for applications by check mailed to a lockbox in St. Louis, Missouri exists in lieu of payment electronically by credit card.

¹¹ This is called the "NCVEC 605" form which was developed by the National Conference of VECs, the informal umbrella organization of VECs of which ARRL is a member and participant.

16. Currently, the form used by VECs states that providing an email address, telephone number and facsimile number is optional for the applicant. Collection of these items should remain optional for VECs and this procedure should not be altered. VECs are already required to collect an SSN or FRN from each successful examinee/applicant; collecting additional personal information from examinees would burden the VECs unnecessarily and such personal information must be kept secure. If, notwithstanding the foregoing, email addresses (and/or telephone or facsimile numbers) should become mandatory for CORES registration, all VECs would require a sufficient amount of time to comply with state or federal record retention and privacy requirements for the additional personal information; it would be necessary to update and replace all forms, software and procedures, and disseminate new information and forms to the VE teams.

17. More generally, however, a rule requiring the furnishing of an e-mail address is both impractical and unenforceable. The Commission cannot establish that a given licensee has an e-mail address. E-mail addresses change, perhaps more often than do telephone numbers. Some radio Amateurs choose not to correspond by e-mail, and that decision should not preclude them from obtaining or maintaining an Amateur Radio license. The proposed requirement should not be adopted. E-mail addresses should remain optional in CORES.

18. The final issue raised in the Notice which has a direct effect on the Amateur Radio Service is a somewhat dated¹² Petition for Rulemaking filed by Frederick Maia (“Maia”), discussed at paragraphs 54-56 of the Notice. Maia’s Petition contains two proposals. First, based on Maia’s observation that, with the exception of an applicant’s TIN, the personal licensee

¹² The Maia Petition was filed July 11, 2007, before the time that the Commission proposed the creation of the CLS.

information contained in CORES is exactly the same as that provided in the ULS, Maia proposes that the CORES system be automatically updated whenever an Amateur Radio licensee updates his or her name and address in ULS. Second, Maia proposes that the Commission require Amateur Radio operators to provide telephone numbers, facsimile numbers and e-mail addresses in CORES and ULS.

19. While ARRL does not oppose the automatic updating of CORES from the ULS under certain circumstances, it is hoped that this issue will be resolved in the configuration of the CLS when that system is rolled out. There is presently in the rules a regulatory obligation to keep CORES data current.¹³ There is in the Amateur Service rules an updating obligation with respect to the ULS. Section § 97.23 of the Commission's rules requires that license grants "must show the grantee's correct name and mailing address...". It is suggested that there are sufficient regulatory provisions now in place to deal with the lack of interaction between the CORES and ULS databases until this can be addressed in the CLS. Presumably, the CLS will consolidate *all* of the Commission's databases and permit updating of licensee information and any FRN information at the same time. Because there does not seem to be any justification for the present lack of interaction between the CORES and ULS databases, ARRL supports as a general matter the proposal that modifications or updates to personal information in CLS should be automatically imported into CORES, and vice versa, in the event that CORES for any reason remains separate from the CLS. However, the Commission should not assume that one mailing address (or other contact information) collected for Amateur Radio licensee contact purposes will necessarily be the preferred address for the licensee relative to CORES information, or with respect to other FCC licenses. For any of a number of reasons, a licensee may want to provide an

¹³ See, 47 C.F.R. § 1.8002.

address for Commission contacts related to Amateur Radio Service licensing that is different from that applicable to fee payment information, or other, non-Amateur Service licensing. Therefore, the opportunity should exist to provide different addresses for CORES and ULS or CLS, or within ULS or CLS for licenses in different radio services. The registrant should have the option to change her or his contact information in multiple records via a centralized input location. Finally on this subject, it is noted that most of the data in CORES is unavailable to the public, but the opposite is true for ULS licensee records. A licensee should be able to keep CORES information private, and that may include the ability to utilize different contact information in CORES from that in the ULS.

20. As to Maia's proposal to require the provision of telephone numbers, facsimile numbers and e-mail addresses in CORES and/or ULS, this proposal must be analyzed in its components. As discussed above, a licensing database might reasonably call for a telephone number for the licensee to permit fast contacts in case of ongoing interference resolution issues. Some non-Amateur Commission applications call for a telephone number for the applicant which is made public in the licensing database. This is not entirely unreasonable, though that information should not be made public without the consent of the licensee.¹⁴ A facsimile number, however, is something not all individuals have, and in fact it is a means of contact that is now somewhat outdated. It is also information that, if available to the public, can be substantially misused. The Commission's prohibition of junk faxes is notably ineffective and those with facsimile numbers generally do not want to make them public for that exact reason. The provision of e-mail addresses is discussed above. Therefore, as to Maia's now somewhat dated

¹⁴ Telephone numbers are doubtless private information that an Amateur Radio licensee may not want to become public.

proposals, there does not readily appear any need to require the disclosure of any of the three items of private information in the context of Amateur Radio registrations in CORES. The Commission simply does not need that private information in that context, and the opportunity exists in the development of the CLS to cause necessary licensee information to be provided and updated as necessary. ARRL suggests that Maia's proposal for mandatory furnishing of this private information be rejected.

21. In summary, this proceeding is somewhat untimely in view of the anticipated development and rollout of the CLS. The value of this proceeding, however, is to point up the fact of the separation between the CORES database system and the ULS (and other Commission licensing systems). This deserves a remedy, but it is suggested that the remedy is likely to be most efficiently implemented in the CLS, rather than patching the CORES and/or ULS systems now. In the meantime, the current regulatory obligation of all licensees to keep CORES information updated is sufficient. At most, the Commission might issue a public notice as to the current obligation of licensees in all radio services to keep CORES information updated manually. Though the Maia petition would leave the impression that only Amateur Radio licensees are unaware of the need to separately update CORES after updating the ULS, the same unawareness most assuredly exists among licensees in most other radio services as well.

Accordingly, ARRL, the National Association for Amateur Radio, respectfully requests

that the Commission proceed with respect to the Notice proposals only in accordance with the foregoing comments.

Respectfully submitted,

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